

CALIFORNIA COASTAL COMMISSION

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Transmitted by Fax

Mr. Mark E. Smythe, Chief
Coastal Stormwater Unit
Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, CA 92501-3348

Subject: Comments on revised Section 7 "New Development/Significant Redevelopment" and Exhibit 7.II "Water Quality Management Plan (WQMP)" of the Orange County Drainage Area Management Plan (DAMP)

Dear Mr. Smythe:

The California Coastal Commission appreciates the opportunity to comment on the revised Section 7 "New Development/Significant Redevelopment" and Exhibit 7.II "Water Quality Management Plan (WQMP)" of the Orange County Drainage Area Management Plan (DAMP). The DAMP addresses water quality protection programs of Local Coastal Programs certified by the Coastal Commission. As such, the Coastal Commission submits the following comments in an effort to enhance consistency among water quality management programs within the coastal zone.

Comment 1:

Section 7.6.2 of the DAMP lists priority project categories and states that the primary difference between a Priority Project and a Non-Priority Project is that Priority Projects are required to include Treatment Control Best Management Practices (BMPs) in project design. Coastal Commission believes that potential impacts to coastal water quality and appropriate methods to mitigate impacts to water quality should be considered for all development projects. The Coastal Commission expects that in most cases, Treatment Control BMPs will not be necessary for Non-Priority Projects; however, for some Non-Priority Projects Treatment Control BMPs are necessary to protect water quality. For example, under the current plan, parking lots for up to 15 cars and projects disturbing up to 10,000 square feet of sloping ground could discharge runoff to environmentally sensitive habitat with no treatment. While these thresholds may be supportable for the county as a whole, they are not appropriate for drainage to wetlands, rocky intertidal areas, enclosed bays, estuaries or lagoons.

Comment 2:

Table 7.II-1 indicates that for the San Diego region, hillside development greater than 5,000 square feet is a Priority project, whereas for the Santa Ana region, the area must be 10,000 square feet or more. The Coastal Commission believes that the 5,000 square feet threshold should be applied to the Santa Ana region to protect water quality in that region.

Comment 3:

Table 7.II-1 indicates that for the San Diego region, "streets, roads, highways, and freeways which would create a new paved surface that is 5,000 square feet or greater" are Priority projects and that this definition is not applied to the Santa Ana region. The Coastal Commission believes that this Priority project category should also be applied to the Santa Ana region.

Comment 4

Section 7.6.3, Projects Adjacent to Beaches (p. 7-30) states, in part, "Grading and Drainage Plans shall be prepared with the following design objectives:

- All surface runoff and subsurface drainage shall be directed to the nearest acceptable drainage facility, via sump pumps if necessary, as determined by the Building Official.
- All roof drains shall be required to connect into a tight-line drainage pipe or concrete swales that drain to the nearest acceptable drainage facility as determined by the Building Official." He did not know the rationale for this. He said that perhaps because it allows the discretion of the Building Official. I asked why infiltration to a vegetative area would not be encouraged. He said that perhaps it is because some small curbside vegetated areas are too small to accept the flows.

These requirements appear to preclude other water quality protection options such as onsite retention, discharge to landscaped areas or infiltration. Please clarify the rationale for requiring untreated discharge to the storm drain system.

The Coastal Commission supports the efforts of the Santa Ana Regional Water Quality Control Board and the Orange County permittees to protect coastal water quality and recommends that the modifications to the DAMP discussed above be adopted and the questions addressed. Thank you for your consideration.

Sincerely,



Jack H. Gregg
Supervisor, Water Quality Unit
California Coastal Commission